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Attorney for Plaintiff
William Pickard

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Subject to the approval of the Court, the parties hereby stipulate and respectfully request entry of an order lifting the stay in this case (*see* ECF No. 181) and establishing the following summary judgment briefing schedule:

- (1) Defendant's Motion for Summary Judgment – January 7, 2014 (1 brief, 15-page limit);
 - (2) Plaintiff's Opposition and Cross Motion for Summary Judgment – January 21, 2014 (1 brief, 15-page limit);
 - (3) Defendant's Opposition and Reply – February 11, 2014 (1 brief, 15-page limit);
 - (4) Plaintiff's Reply – February 25, 2014 (1 brief, 10-page limit).

Hearing – March 28, 2014, 10:00 a.m.

In light of the previous round of summary judgment briefing (*see* ECF Nos. 140, 152, 161, 162), the parties anticipate incorporating by reference arguments made in those briefs into the forthcoming motions for summary judgment.

Respectfully submitted,

Dated: November 1, 2013

By: /s/ Mark Rumold
MARK RUMOLD
Attorney for Plaintiff

Dated: November 1, 2013

MELINDA HAAG
United States Attorney

By: /s/ Neill Tseng (by permission)
Neill T. Tseng
Assistant United States Attorney
Attorney for Defendant

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2 **DECLARATION PURSUANT TO LOCAL RULE 5.1**

3 I, Mark Rumold, hereby declare pursuant to Local Rule 5.1 that I have obtained
4 Defendants' concurrence in the filing of this document from Neill T. Tseng, Counsel for
5 Defendant.

6 Executed on November 1, 2013, in San Francisco, California.
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8 /s/ Mark Rumold
9 Mark Rumold

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11 **ORDER**

12 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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14 DATED: October 31, 2013



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